UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA CASE NO. 20-cv-954-WO-JLW

FARHAD AZIMA,

Plaintiff,

v.

PLAINTIFF'S MOTION TO SEAL

NICHOLAS DEL ROSSO and VITAL MANAGEMENT SERVICES, INC.,

Defendants.

Plaintiff Farhad Azima respectfully moves this Court to file under seal his Objections to or Appeal of Special Master's Report and Decision No. 7 and Exhibits 1-5, 9-11, 15, 17-19, 21-22, 26-27. The grounds for this motion are set forth in the memorandum in support of the motion filed contemporaneously herewith. To the extent the Court determines that one or more of these documents should not be sealed, Plaintiff requests a reasonable time in which to attempt to redact any portion of these documents that may be appropriately redacted and for further relief as is just and appropriate.

This, the 5th day of June, 2024.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand

Ripley Rand (N.C. State Bar No. 22275) Christopher W. Jones (N.C. State Bar No. 27265) 555 Fayetteville Street, Suite 1100

Raleigh, North Carolina 27601

Telephone: (919) 755-2100 Facsimile: (919) 755-2150

Email: ripley.rand@wbd-us.com

chris.jones@wbd-us.com

MILLER & CHEVALIER CHARTERED

Kirby D. Behre (pro hac vice)
Timothy P. O'Toole (pro hac vice)
Lauren Briggerman (pro hac vice)
Ian Herbert (pro hac vice)
Calvin Lee (pro hac vice)
Cody Marden (pro hac vice)
900 Sixteenth Street, NW

Washington, D.C. 20005 Telephone: (202) 626-5800 Facsimile: (202) 626-5801

Email: <u>kbehre@milchev.com</u>

totoole@milchev.com

lbriggerman@milchev.com iherbert@milchev.com

clee@milchev.com

<u>cmarden@milchev.com</u>

Counsel for Plaintiff Farhad Azima

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA Case No. 20-CV-954-WO-JLW

FARHAD AZIMA,

Plaintiff,

v.

CERTIFICATE OF SERVICE

NICHOLAS DEL ROSSO and VITAL MANAGEMENT SERVICES, INC.,

Defendants.

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of this Notice to the following attorneys:

Brandon S. Neuman, Esq.
Jeffrey M. Kelly, Esq.
NELSON MULLINS RILEY & SCARBOROUGH, LLP
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
brandon.neuman@nelsonmullins.com
jeff.kelly@nelsonmullins.com

Samuel Rosenthal
NELSON MULLINS RILEY & SCARBOROUGH, LLP
101 Constitution Ave. NW, Suite 900
Washington, DC 20001
sam.rosenthal@nelsonmullins.com

Justin B. Kaplan George C. Mahfood NELSON MULLINS RILEY & SCARBOROUGH, LLP 2 South Biscayne Blvd., 21st Floor Miami, FL 33131

Email: justin.kaplan@nelsonmullins.com Email: george.mahfood@nelsonullins.com

Counsel for Defendants

Richard S. Glaser Parker Poe Adams & Bernstein LLP Bank of America Tower 620 S. Tryon St., Suite 800 Charlotte, NC 28202

Email: <u>rickglaser@parkerpoe.com</u>

Nana Asante-Smith Parker Poe Adams & Bernstein LLP PNC Plaza 301 Fayetteville Street, Suite 1400 Raleigh, NC 27601 Email: nanaasantesmith@parkerpoe.com

maii.

Counsel for Christopher Swecker and Christopher Swecker Enters. LLC

This, the 5th day of June, 2024.

WOMBLE BOND DICKINSON (US) LLP

/s/ Ripley Rand

Ripley Rand North Carolina State Bar No. 22275 555 Fayetteville Street, Suite 1100 Raleigh, NC 27601

Telephone: (919) 755-8125 Facsimile: (919) 755-6752

Email: ripley.rand@wbd-us.com

Counsel for Plaintiff